



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

August 27, 2012

Mr. Thomas Bonetti
United States Fish and Wildlife Service
Regional Office
300 Westgate Center Drive
Hadley, MA 01035

Re: Draft Prime Hook National Wildlife Refuge Draft Comprehensive Conservation Plan and Environmental Impact Statement, May 2012, CEQ # 20120175

Dear Mr. Bonetti:

In accordance with the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the United States Environmental Protection Agency (EPA) has reviewed the draft Prime Hook National Wildlife Refuge's Draft Comprehensive Conservation Plan and Environmental Impact Statement (DCCP/EIS). The DCCP/EIS recommends Alternative B as the preferred alternative. Based on our review, we rate the environmental impacts of the proposed action as LO (Lack of Objections). A description of our rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

The Refuge was established in 1963 and is an elongated coastal strand covering 10,132 acres that lies parallel to the Delaware Bay in Milton, Sussex County, Delaware. The Refuge is currently divided into four management units and was manipulated prior to US Fish and Wildlife Service (FWS) ownership. The current Refuge System policies direct refuge managers to assess the historic (pre-human) condition or natural conditions of refuge ecosystems to inform management decisions. The Comprehensive Conservation Plan will provide management direction for the next 15 years, but allows for adaptive management if new information or conditions arise.

The DCCP/EIS evaluates three alternatives:

- Alternative A is the "No Action" or "Current Management" alternative;
- Alternative B is the FWS-Preferred Alternative and is described as a proactive management approach in response to changing conditions including sea level rise, increased coastal storm activity and force, and changes in plant and animal population distributions associated with changing temperature regimes. Alternative B will enhance existing marshes in some areas and place an emphasis on restoring upland habitats to native cover in areas that were previously farmed or otherwise open. Alternative B will

also expand existing opportunities for public uses, with additional emphasis on hunting and wildlife observation and photography. Alternative B allows for the natural processes of inlet formation, sand migration, and overwash development, conserves spawning horseshoe crab habitat, controls invasive species, and protects migrating shorebird breeding areas from human disturbance. Comprehensive monitoring and survey programs will be used to measure changing conditions as well as the success with respect to the objectives of the DCCP/EIS, and modifications can be made, if necessary.

- Alternative C proposes to return habitat management programs which were conducted on the Refuge for several decades, but had been stopped in recent years. These programs include cooperative farming and management of freshwater wetland impoundments. Management of freshwater impoundments was conducted from the early 1980's until 2009. Breaches along the Refuge shoreline introduced full tidal flow of salt water into the wetlands converting them into brackish/salt marsh and large expanses of open water.

We recommend that the FWS continue work closely with federal, state, and local stakeholders throughout the implementation of this plan and any adaptive management decisions. In addition, the FWS should coordinate closely with the U.S. Army Corps of Engineers and EPA on any Section 404 permit issues that may arise from impacts to waters of the United States.

It should also be clarified in the DCCP/EIS that all pesticides must be mixed, loaded and applied in accordance with label specifications and all applicators must be certified with the Delaware Department of Agriculture or working under the supervision of a certified applicator.

Thank you for the opportunity to offer these comments. If you have any questions, please do not hesitate to contact Ms. Barbara Okorn, staff contact, at (215) 814-3330.

Sincerely,



Jeffrey D. Lapp, Associate Director
Office of Environmental Programs